

The action is stayed until July 31, 2020. The parties should jointly advise the Court before July 31, 2020 with respect to a proposed schedule for further proceedings in this case.
So Ordered.

New York, NY
March 13, 2020

/s/ John G. Koeltl

John G. Koeltl
U.S.D.J.

Akin Gump

STRAUSS HAUER & FELD LLP

MICHAEL W. MCTIGUE JR.
+1 215.965.1265/fax: +1 215.965.1210
mmctigue@akingump.com

March 4, 2020

VIA ELECTRONIC COURT FILING

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Marcos Calcano v. Uniqlo USA LLC*, Civil Action No. 19-cv-10438

Dear Judge Koeltl:

We represent Uniqlo USA, LLC (“Defendant”) in the above-captioned matter. Pursuant to Local Civil Rule 7.1(d) and Rule 1.E of Your Honor’s Individual Practices and Rules, Defendant, with the consent of Plaintiff, writes to request a stay of this action. The stay is requested to allow for the resolution of pending motions to dismiss filed in similar matters that involve claims under Title III of the Americans with Disabilities Act, the New York State Human Rights Law, and the New York City Human Rights Law based on the alleged failure to offer gift cards embossed with Braille lettering. Over 200 of these actions are currently pending before this Court and before other judges in this district and the Eastern District of New York. A stay has the potential to substantially conserve the resources of both the parties and the Court. Similar stays were recently granted by courts in this district on the same grounds. *See Calcano v. lululemon USA Inc.*, No. 1:19-cv-10430 (S.D.N.Y. Mar. 2, 2020); *Delacruz v. Five Below, Inc.*, No. 1:19-cv-10294 (S.D.N.Y. Feb. 28, 2020); *Delacruz v. Jamba Juice Co.*, No. 1:19-cv-10321 (S.D.N.Y. Feb. 27, 2020); *Calcano v. Domino’s Pizza, Inc.*, No. 1:19-cv-09823 (S.D.N.Y. Feb. 24, 2020). The only deadlines impacted by the proposed stay are the deadlines the Court established on March 2, 2020 when it permitted Defendant to file a motion to dismiss and the Initial Conference scheduled for March 30, 2020.

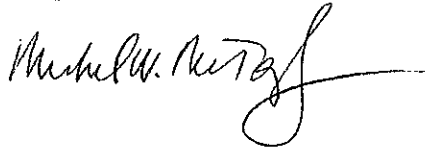
Alternatively, should the Court not grant the requested stay, Defendant requests a 30-day enlargement of time, up to and including, April 15, 2020, to file its motion to dismiss (and corresponding 30-day extensions for the response and reply). Defendant’s current deadline to move to dismiss is March 16, 2020. The undersigned has conferred with counsel for Plaintiff who consents to this request. This is the first request for an extension of time in connection with the motion to dismiss deadlines.



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We appreciate Your Honor's consideration of this request.

Respectfully submitted,



Michael W. McTigue Jr.

cc: Jeffrey M. Gottlieb (via ECF)
Bradley G. Marks (via ECF)